

**National Office Clarification on Enrolled vs. Attending School:**

Recently the state requested clarification from the Regional Office concerning the distinction between enrolled vs. attending school as a result of technical assistance provided to a local area on this subject:

As a result of the inquiry, the National Office issued its guidance to the Regional Office for dissemination to the State based on the following scenarios. The National Office reference to "The three examples provided below..." are the Examples 1-3.

**OOWD Youth Policy and Program Officer request for clarification on Enrolled vs. Attending School:**

OOWD interpretation of enrolled vs. attending school is that there is no distinction between the two and youth enrolled in post-secondary education have a contractual agreement to pay tuition and fees in exchange for education. Therefore, should be enrolled in the WIOA program as In-school-youth.

However, there are interpretations that youth enrolled in class are considered out-of-school youth because they have not started attending class and enrollment is no guarantee that they will attend class.

**Example #1:** A youth enrolled in classes can walk into a workforce center on Thursday and get enrolled into the WIOA Youth program as an out-of-school youth even though classes begin on Monday if we follow the assumption that you must be attending school, i.e., in class at the time of WIOA enrollment. Or;

**Example #2:** A youth enrolled in class on Thursday the 18th walks into a workforce center to get enrolled into the WIOA Youth program on Friday the 19th and classes started on the past Monday the 15th. However, the youth has not attended classes the 1st week of school. If you have to be attending class, then this youth would qualify as an out-of-school youth.

**Example #3:** A youth graduated from High School and then enrolled at the University. However, is not scheduled to start class until August 15th. The youth walks in a workforce center on August 1st and is enrolled as an out-of-school youth because they are not currently attending class.

Let's look further into how the term enrollment is viewed under WIA and WIOA as an obligation to pay:

**WIOA Section 681.570:**

You have to be enrolled in postsecondary education to receive WIOA assistance with books, fees, school supplies, and other necessary items for students.

**WIA TEGL: 28-10 still active:**

Examples of expenditures that are to be reported to ETA include: (d) the cost of training which has been received by enrolled participants; and (e) the cost of tuition paid up front for participants enrolled in classes as explained below.....

The full cost of tuition for the current semester/quarter classes in which an individual is enrolled can be expensed when paid up front.

**National Office Response 8/19/16**

*"We recognize that the final rule does not definitively address enrolled versus attending school for purposes of determining school status. We plan to issue further guidance to address this question."*

***The Department interprets attending school to be the same as enrolled in school.*** Therefore, a youth who is enrolled in postsecondary school or postsecondary classes (including if one is between semesters or school years or during the summer prior to starting postsecondary education) is considered to be attending school for purposes of school status determination. The three examples provided below would all be considered in-school youth.

*If a youth is not yet "enrolled" in education but "intends" to enroll he or she would be an OSY. The important part is whether they are enrolled in it, not when it actually starts."*